

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR ADMISSIONS,
INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH CAROLINA
et al.,**

Defendants.

PLAINTIFF’S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Federal Rule of Civil Procedure 34 and the Local Rules of the Middle District of North Carolina, Plaintiff Students for Fair Admissions, Inc. (“SFFA”) requests that Defendants respond in writing and produce the documents described below within 30 days of service for inspection and copying at the offices of Consovoy McCarthy PLLC, 3033 Wilson Boulevard, Suite 700, Arlington, VA 22201, or at such other location to which the parties mutually agree.

INSTRUCTIONS

1. In responding to these document requests, You shall produce separately all documents in Your possession, custody or control, including documents in the possession, custody or control of Your agents and representatives.

students, the graduation rate at UNC-CH of enrolled students, the academic performance at UNC-CH of enrolled students, or the debt levels accrued by enrolled students while at UNC-CH.

33. All documents concerning any complaint You received about the use of race in UNC-CH's admissions process during the Relevant Period, including (but not limited to) documents concerning the investigation and resolution of any complaint.

34. All reports, analyses, surveys, or other reviews or assessments prepared by Your employees or agents during the Relevant Period concerning race-neutral alternatives at UNC-CH (regardless of whether those reports, analyses, surveys or other reviews or assessments were completed or finalized).

35. All documents from each admissions cycle during the Relevant Period sufficient to show Your efforts to evaluate the feasibility and effects of race-neutral alternatives to racial preferences at UNC-CH, and how these alternatives compared to current admissions policies in achieving the educational benefits of diversity.

36. All documents concerning Your ranking, weighting, and evaluation of secondary schools during the Relevant Period and any documents sufficient to show how You arrived at such rankings, weighting, and evaluation of secondary schools.

37. All documents that mention any of the following publications as the content of these publications relate to admissions policy at UNC-CH:

a. Arcidiacono, Peter, Aucejo, Esteban & Spenner, Ken, What Happens after Enrollment? An Analysis of the Time Path of Racial Differences in GPA and Major Choice (*June 2, 2011), available at [http:// public.econ.duke.edu/~psarcidi/grades.4.0.pdf](http://public.econ.duke.edu/~psarcidi/grades.4.0.pdf);

1. William G. Bowen, Martin A. Kurzweil, Eugene M. Tobin, and Susanne C. Pichler, *Equity and Excellence in American Higher Education*.

38. All documents that either mention academic “mismatch” (as that term is used in the publications listed in Request 37) as it relates to admissions or admissions policy at UNC-CH or that otherwise concern the academic performance of enrolled students who are or were academically underprepared for UNC-CH.

39. All communications during the Relevant Period concerning SFFA, the Plaintiff and its representatives, the Complaint, or this action (before or after it was filed).

40. All documents from any time that UNC contends support any denial or defense in the Answer to the Complaint.